

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

Robin E. Figas,  
*and all others similarly situated,*

Plaintiffs,

v.

Wells Fargo & Company, Employee  
Benefit Review Committee, Howard I.  
Atkins, Patricia Callahan, Ellen Haude,  
Mike Heid, Clyde Ostler, Tim Sloan, John  
G. Stumpf, Peter J. Wissinger, and Doe  
Defendants 1-20.

Defendants.

Civil File No. 08-CV-4546 (PAM/FLN)

**PLAINTIFFS' MOTION FOR FINAL  
APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff Robin E. Figas and the Class respectfully move the Court for the entry of an order (1) granting final approval of the proposed Settlement in this class action case, (2) unconditionally certifying the Settlement Class, (3) finding the manner and form of giving notice of the Settlement and the Fairness Hearing to the Class satisfies the requirements of due process and the Court's Preliminary Approval Order (Docket No. 262), and (4) granting final approval of the Plan of Allocation.

The grounds for the requested relief are set forth in the accompanying memorandum of law and supporting exhibits and declaration.

Respectfully submitted,

Dated: July 7, 2011

By: /s/ Gregory Y. Porter

**McTIGUE & VEIS LLP**

J. Brian McTigue (*admitted pro hac vice*)  
Bryan T. Veis (*admitted pro hac vice*)  
James A. Moore (*admitted pro hac vice*)  
4530 Wisconsin Avenue, NW  
Suite 300  
Washington DC, 20016  
Tel: (202) 364-6900

**SPRENGER & LANG PLLC**

Michael D. Lieder (*admitted pro hac vice*)  
Bryce M. Miller (MN Bar No. 386901)  
1400 Eye St. Ste 500  
Washington, DC 20005  
Tel: (202) 772-1157

**BAILEY & GLASSER LLP**

Gregory Y. Porter (*admitted pro hac vice*)  
James B. Perrine (*admitted pro hac vice*)  
910 17th Street, NW  
Suite 800  
Washington, DC 20006  
Tel: (202) 463-2101

**ROBINS, KAPLAN, MILLER &  
CIRESI LLP**

Joel A. Mintzer  
800 LaSalle Avenue  
2800 LaSalle Plaza  
Minneapolis, MN 55402  
Tel: (612) 349-8244

*Attorneys for Plaintiffs*